

Hearing Date and Time: November 17, 2022 at 2:00 p.m. (Eastern Time)
Objection Date and Time: November 7, 2022 at 4:00 p.m. (Eastern Time)

Stout Risius Ross, LLC
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*Real Estate Consultants and Advisors for Debtors
and Debtors in Possession, Acting at the Direction
of the Restructuring Sub-Committee*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : **Chapter 11**
: **SEARS HOLDINGS CORPORATION, et al.,** : **Case No. 18-23538 (SHL)**
: **Debtors.¹** : **(Jointly Administered)**
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**NOTICE OF HEARING ON
THE FINAL FEE APPLICATION OF STOUT RISIUS ROSS, LLC**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innoval Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); SHC Licensed Business LLC (3718); SHC Promotions LLC (9626); Sears Brands Management Corporation (5365), and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

PLEASE TAKE NOTICE that a hearing to consider the final fee application of Stout Risius Ross, LLC, Real Estate Consultant and Advisor for the Debtors, for the Period From November 21, 2018 Through and Including June 30, 2019 [ECF No. 10667] (“Stout’s Final Fee Application”) shall be heard before the Honorable Sean H. Lane, United States Bankruptcy Judge for the Southern District of New York, in the United States Bankruptcy court for the Southern District of New York (the “Bankruptcy Court”), 300 Quarropas Street, White Plains, New York, 10601 on **November 17, 2022 at 2:00 p.m. (Eastern Time)** (the “Hearing”), or as soon thereafter as counsel may be heard. The Hearing will be conducted remotely via Zoom. Anyone wishing to attend the hearing must make an electronic appearance through the “eCourtAppearances” tab on the Bankruptcy Court’s website, <https://www.nysb.uscourts.gov/ecourt-appearances>, no later than 4:00 p.m. one business day prior to the hearing (the “Appearance Deadline”).

PLEASE TAKE FURTHER NOTICE that Stout’s Final Fee Application has been electronically filed with the Bankruptcy Court’s CM/ECF system and is available for examination and inspection by interested parties on the Bankruptcy Court’s website for a fee by visiting www.nysb.uscourts.gov, or for free by visiting the website of the Debtors’ Court-approved claims agent, Kroll Restructuring Administration LLC, in connection with these chapter 11 cases at [https://restructuring.ra.kroll.com/sears](http://restructuring.ra.kroll.com/sears).

PLEASE TAKE FURTHER NOTICE that any responses or objections (“Objections”) to Stout’s Final Fee Application shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with General Order M-399 and the *Amended Order Implementing Certain Notice and Case Management Procedures*, dated November 1, 2018 (ECF No. 405), so as to be so filed and received no later than **November 7, 2022 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no Objection to Stout’s Final Fee Application is received by the Objection Deadline, such fee application shall be deemed unopposed, and the Bankruptcy Court may enter an order granting such application without a hearing.

Dated: October 11, 2022
New York, New York

/s/ Robert A. Britton
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